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 9 Agency & Power Commission

10 UNITED STATES BANKRUPTCY COURT  
 11  
 12 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

13 In re

14 PG&E Corporation,  
 15 and

16 PACIFIC GAS AND ELECTRIC  
 17 COMPANY,

18 Debtors.

Case No. 19-30088-DM

Chapter 11  
 Lead Case, Jointly Administered

**MENDOCINO COUNTY INLAND  
 WATER AGENCY & POWER  
 COMMISSION'S RESERVATION OF  
 RIGHTS IN RESPONSE TO  
 REORGANIZED DEBTORS' FIFTH  
 OMNIBUS OBJECTION TO CLAIMS  
 (ECF No. 8759)**

19 ☒ Affects PG&E Corporation  
 20 ☐ Affects Pacific Gas and Electric Company  
 21 ☒ Affects both Debtors

22 \*All papers shall be filed in the Lead Case,  
 23 No. 19-30088-DM,

Date: September 22, 2020  
 Time: 10:00 a.m. (Pacific Time)  
 Place: (Telephonic Appearances Only)  
 United States Bankruptcy Court  
 Courtroom 17, 16<sup>th</sup> Floor  
 San Francisco, CA 94102

24 Mendocino County Inland Water Agency & Power Commission ("Commission") submits  
 25 this limited opposition and reservation of rights in response to the *Reorganized Debtors' Fifth*  
 26 *Omnibus Objections to Claims (Duplicate Claims)* (ECF No. 8759) regarding the Commission's  
 27 Claim No. 79361 filed against PG&E Corporation on October 21, 2019.

28 The Commission is a public agency subject to public meeting requirements under the laws  
 of the State of California. The Commission has engaged in an internal review of the Fifth Omnibus  
 Objection to Claim No. 79361, and has authorized action in response to PG&E's Fifth Omnibus  
 Objection to Claim No. 79361 subject to a final due diligence review. The Commission propounded

1 limited discovery related to the Fifth Omnibus Objection to Claim No. 79361, to which PG&E  
2 Corporation has not yet responded. Accordingly, the Commission files this limited opposition to  
3 reserve its rights in advance of the hearing scheduled for October 13, 2020. The Commission  
4 anticipates the objection being resolved consensually, subject only to the confirmation of the  
5 responses requested in the limited discovery (three special interrogatories) recently propounded.

6 This limited opposition solely addresses the Commission's Claim No. 79361 and in no way  
7 impacts or affects the Commission's separate Claim No. 86469 filed against Pacific Gas and Electric  
8 Company on October 21, 2019. The Commission expressly reserves any and all rights with respect  
9 to Claim No. 86469 as it is not addressed or referenced in the Fifth Omnibus Objection.

10  
11 DATED: September 22, 2020

DOWNEY BRAND LLP

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13 By: /s/ Jamie P. Dreher  
14 JAMIE P. DREHER  
15 Attorney for Mendocino County Inland Water &  
16 Power Commission  
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